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## 6 | Attorneys for Plaintiff

Taizhou Luqiao Shengqiang Housewares Factory.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

10 Taizhou Luqiao Shengqiang Housewares Factory,

Plaintiff.

V.

Dbest Products, Inc.,

## Defendant

**CASE NO. 2:24-cv-10842-MWC-JC**

## **SEESPRING'S SECOND AMENDED COMPLAINT**

## DEMAND FOR JURY TRIAL

16 Plaintiff Taizhou Luqiao Shengqiang Housewares Factory (“Seespring” or  
17 “Plaintiff”) files this Second Amended Complaint against Defendant dbest products,  
18 Inc. (“Defendant”), and alleges as follows:

## NATURE OF THE ACTION

20 1. Plaintiff brings this action for tortious interference and unfair

SEESPRING'S SECOND AMENDED  
COMPLAINT

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1 competition arising from Defendant's wrongful assertion of the U.S. Patent No.  
2 12,103,576 (the “576 Patent”) against Plaintiff's products Non-Infringing Shoe  
3 Boxes (“Non-Infringing Shoe Boxes”). Defendant's baseless infringement  
4 complaint caused Amazon to remove Plaintiff's listings for the Non-Infringing Shoe  
5 Boxes on Amazon.com, and disrupted Plaintiff's lawful business. Plaintiff seeks to  
6 be made whole for the harm it has suffered.

7 **THE PARTIES**

8 2. Plaintiff Taizhou Luqiao Shengqiang Housewares Factory is a Chinese  
9 general partnership having its principal place of business at No.6 Factory Building,  
10 Shangzhang Village, Lunan Street, Luqiao District, Taizhou, China.

11 3. Upon information and belief, dbest products, Inc. is a corporation  
12 organized under the laws of the State of California, with its principal place of  
13 business at 16506 S Avalon Blvd, Carson, California 90746.

14 **JURISDICTION AND VENUE**

15 4. This Court has original subject matter jurisdiction over this action  
16 pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or  
17 value of \$75,000, exclusive of interest and costs, and because this matter is between  
18 Plaintiff, a citizen or subject of a foreign state, and Defendant, a citizen of the State  
19 of California.

20 5. This Court has personal jurisdiction over dbest products, Inc. because

1 dbest products, Inc. is a corporation organized and existing under the laws of  
2 California, with its principal place of business alleged to be at 16506 S Avalon Blvd,  
3 Carson, California 90746, which is within this judicial district.

4 6. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1)  
5 because dbest products, Inc. resides in this District, as defined by 28 U.S.C. §  
6 1391(c)(2).

7 **FACTUAL BACKGROUND**

8 **A. The Non-Infringing Shoe Boxes**

9 7. Plaintiff conducts business through a storefront on Amazon.com under  
10 the name “SeespringDirect,” offering a variety of Non-Infringing Shoe Boxes for  
11 sale. These products are identified by Amazon Standard Identification Numbers  
12 (ASINs), including but not limited to B097PVKRYM, B09276QSJJ,  
13 B0CQ1PQVRH, B0BBCH5H7Y, B0D26BC6C3, B08RJ13R3R, B0BBCHVGSC,  
14 B0DJNV4RV2, B0DJNTBTJX, B0CQ1YYQHM, B0BKSFL31H, B0BKSFY6WX,  
15 B0B81VGLWP and B0B81SQL2Z.

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**FIG.1 Plaintiff's Non-Infringing Shoe Box**

8. On or about December 5 and 6, 2024, Plaintiff received notifications from Amazon stating that the listings for the aforementioned ASINs were removed due to alleged infringement of the '576 Patent.

9. On or about December 12, 2024, Plaintiff, through counsel, contacted Defendant to request the withdrawal of its complaint to Amazon based on non-infringement.

10. On or about December 17, 2024, Plaintiff submitted an appeal based on, *inter alia*, non-infringement analysis to Amazon, requesting the reinstatement of Plaintiff's Non-Infringing Shoe Boxes. As a result of Plaintiff's submission, Amazon reinstated twelve (12) of the ASINs listed above on or about December 18, 2024, and the remaining two (2) ASINs, B0BKSFL31H and B0DJNTBTJX, on or about January 2, 2025.

11. On December 23 and 26, 2024, Plaintiff contacted Defendant again to request the withdrawal of Defendant's baseless complaint to prevent Defendant

1 from filing additional baseless complaints to delist Plaintiff's Non-Infringing Shoe  
2 Boxes.

3       12.    Defendant claimed that it attempted to withdraw its complaint  
4 through Amazon's Brand Registry Portal on December 22, 2024, but was  
5 unsuccessful. Defendant further asserted that it contacted its Amazon account  
6 representative on January 2, 2025, to request manual reinstatement of the following  
7 ASINs:   B08RJ13R3R,   B097PVKRYM,   B0D26BC6C3,   B09276QSJJ,  
8 B0BBCHVGSC, and B0BBCH5H7Y. But Defendant's efforts came too late. All of  
9 these ASINs had already been reinstated by Amazon on December 18, 2024,  
10 following Plaintiff's own appeal and non-infringement submission.

11       13.    Since Plaintiff filed this lawsuit, Defendant issued an unconditional  
12 covenant not to sue on January 23, 2025, agreeing not to assert any rights under  
13 the '576 Patent against Plaintiff or any other parties involved in the production,  
14 distribution, or sale of the Non-Infringing Shoe Boxes in the United States. *See*  
15 Exhibit. 3, Covenant Not to Sue. But Defendant's covenant comes too late. Its  
16 complaint to Amazon had already resulted in the delisting of Plaintiff's products,  
17 disrupted Plaintiff's business operations, damaged relationships with customers, and  
18 caused financial losses, including lost sales and increased operational costs.  
19 Moreover, Plaintiff's sales performance and visibility on Amazon remain affected,  
20 and the harm to its goodwill and competitive standing in the marketplace persists.

1       14.     The Amazon marketplace constitutes Plaintiff's primary sales channel  
2 into the United States. To remain competitive in the United States market, Plaintiff  
3 needs the Non-Infringing Shoe Boxes listed in the Amazon marketplace. Amazon  
4 has removed the Non-Infringing Shoe Boxes from the marketplace, preventing  
5 Plaintiff from accessing their largest channel of trade because of Defendant's  
6 alleged infringement complaint to Amazon. Thus, Defendant's submission of  
7 Amazon infringement complaint has caused immediate and substantial harm to  
8 Plaintiff.

9       15.     Upon information and belief, Defendant did not obtain samples of  
10 Plaintiff's Non-Infringing Shoe Boxes prior to filing its complaint with Amazon  
11 alleging Plaintiff's infringement.

12 **B. The Patent-In-Suit**

13       16.     The '576 Patent lists dbest products, Inc. as the applicant and  
14 assignee. *See Exhibit 1, '576 Patent, at 1.*

15       17.     The '576 Patent, titled "Stackable Collapsible Carts," describes its  
16 purported invention as "a collapsible cart designed to transition from a closed,  
17 folded condition to an open, expanded condition for use."

18       18.     Claims 1, 11 and 15 are the only independent claims of the '576  
19 Patent.

20       19.     Claim 1 requires:

1 a first track formed along the first right panel and the second right  
2 panel extending from a first position on the first right panel to a  
3 second position on the second right panel; and  
4 a first slideable member cooperatively engaged to the first track, the  
5 first slideable member is movable along the first track between an  
6 open position to a closed position to selectively lock the first right  
7 panel to the second right panel, wherein the first slideable member is  
8 in the open position when disposed along the first track adjacent the  
9 first position of the first track while not disposed along the second  
10 right panel and is in the closed position when disposed along the first  
11 track adjacent the second position of the first track while being  
12 disposed across both the first right panel and second right panel.

13 *See Exhibit 1 at 11:52-67.*

14 20. Claim 11 requires:

15 the right sidewall comprising a first right panel rotatably coupled to a  
16 second right panel, the right sidewall further comprising a third right  
17 panel, wherein the second right panel and the third right panel  
18 conform in shape to collectively cover the opening in the first right  
19 panel and, the second right panel comprises a ribbed wall with a  
20 plurality of ribs; and

1 a first lock assembly integrated with the first right panel and the  
2 second right panel, the first lock assembly having a first condition for  
3 locking the first right panel to the second right panel, and a second  
4 condition for unlocking the first right panel from the second right  
5 panel.

6 *See Exhibit. 1 at 12:63-13:9.*

7 21. Claim 15 requires:

8 the rigid top cover has an indentation pattern being at least  
9 substantially aligned with the vertical axis of the wheel assembly, the  
10 indentation pattern configured to receive a wheel assembly from  
11 another identical collapsible cart when stacked vertically.

12 *See Exhibit. 1 at 14:12-16.*

13 22. On March 28, 2023, U.S. Provisional Application No. 63/577,068 (the  
14 “Provisional Application”), from which the ’576 Patent claims priority, was filed.  
15 The Provisional Application first added drawings regarding at least the “third right  
16 panel” but fails to provide sufficient disclosure to satisfy the requirements for  
17 written description and enablement under patent law. These drawings are  
18 substantially similar to certain HAIXIN products, which were first made publicly  
19 available on or before July 29, 2022. *See Exhibit. 2, U.S. Provisional Application*  
20 *No. 63/577,068, at 10–16 and HAIXIN Closet Organizers and Storage (accessible at*

1 https://www.amazon.com/dp/B0B4FZWRVR?psc=1, last visited Jan. 15, 2025).

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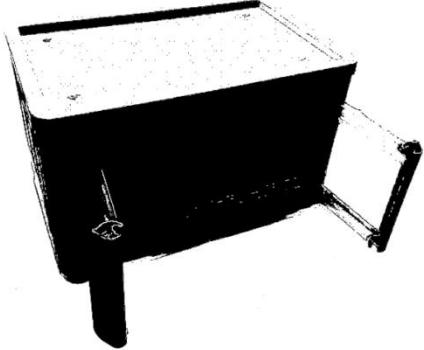
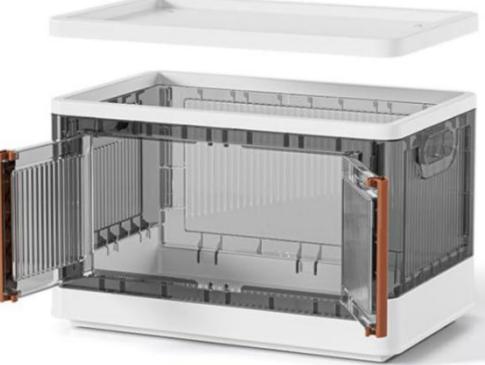
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Photograph of the Provisional Application	Photograph of HAIXIN Closet Organizers and Storage
	

23. On December 15, 2023, the '576 Patent (Application No. 18/542,495) was filed, including newly added matter regarding the "third right panel," which is not sufficiently disclosed in any prior parent applications or patents.

24. All of the drawings, except Figure 44, regarding at least the "third right panel" of the '576 Patent are substantially similar to those in HAIXIN's Chinese Patent No. CN214987334 ("the '334 Patent"), which was published on December 3, 2021. For example, Figure 42A of the '576 Patent is almost identical to

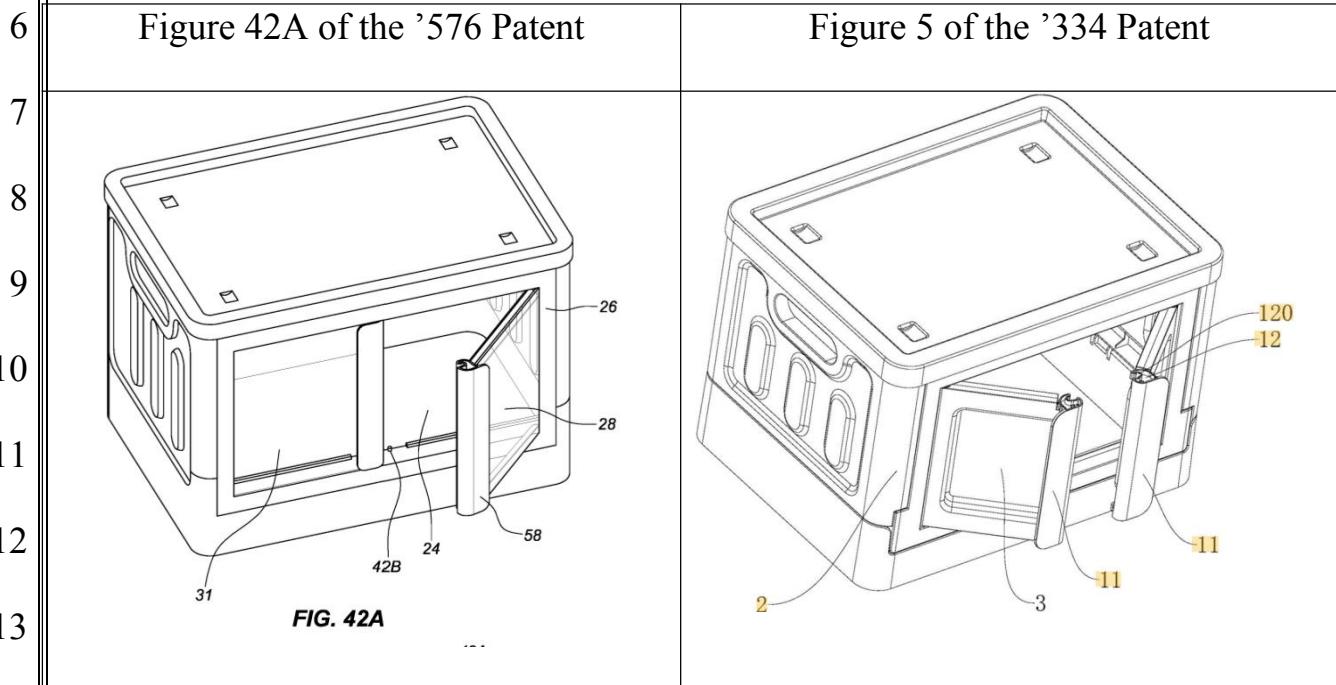
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1 Figure 5 of the '334 Patent. *See* Exhibit. 1, Fig. 42A and the '334 patent ( available  
2 at <https://patents.google.com/patent/CN214987334U/en?oq=CN214987334>, last  
3 visited Jan. 13, 2025).

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15        25.     As can be seen in the above images, the drawings regarding the “third  
16 right panel” of the '576 Patent are copied from those of HAIXIN's '334 Patent. This  
17 degree of detailed copying confirms that Defendant intentionally and willfully  
18 reproduced these drawings.

19

20        26.     The '576 Patent (Application No. 18/542,495) is designated as a  
continuation of parent application No. 18/161,677, which was filed on January 30,

1 2023.

2 27. However, the '576 Patent is a continuation-in-part, rather than a  
3 continuation, of the parent application No. 18/161,677, as misrepresented by  
4 Defendant before the United States Patent and Trademark Office ("USPTO").  
5 Defendant knew, or should have known, that a continuation-in-part application adds  
6 new matter relative to its parent application and, therefore, is not entitled to priority  
7 of its parent.

8 28. The earliest effective filing date of the '576 Patent, at least for Claim  
9 11, is December 15, 2023, rather than January 6, 2020, as misrepresented by  
10 Defendant before the USPTO.

11 **COUNT I**

12 **State Law Unfair Competition – Cal. Bus. & Prof. Code § 17200**

13 29. Plaintiff repeats and realleges each of the preceding paragraphs as if  
14 they are restated here and incorporates them by reference.

15 30. Defendant's acts, as set forth above, constitute unlawful, unfair,  
16 and/or fraudulent business practices as defined under California Business and  
17 Professions Code § 17200, *et seq.*

18 31. Defendant has acted unlawfully and unfairly by submitting baseless  
19 complaints to Amazon that resulted in the wrongful removal of Plaintiff's Non-  
20 Infringing Shoe Boxes from Amazon.com.

1 32. By abusing Amazon's intellectual property enforcement procedures,  
2 Defendant caused significant disruption to Plaintiff's business operations, including  
3 the removal of the Non-Infringing Shoe Boxes that do not infringe any valid  
4 intellectual property rights.

5       33.     As a direct and proximate result of Defendant's unfair competition,  
6 Plaintiff has been, and continues to be, materially harmed in an amount to be proven  
7 at trial.

## COUNT II

## Tortious Interference

10 34. Plaintiff repeats and realleges each of the preceding paragraphs as if  
11 they are restated here and incorporates them by reference.

12 35. Plaintiff entered into “Amazon Services Business Solutions  
13 Agreement” alongwith other agreements with Amazon and conducts business  
14 through a storefront on Amazon.com, and thus, Plaintiff enjoyed an economic  
15 relationship with Amazon and Plaintiff’s existing customers, with probability of  
16 future economic benefit to Plaintiff had Plaintiff’s Non-Infringing Shoe Boxes not  
17 been removed from Amazon marketplace. Defendant knowingly and intentionally  
18 interfered with Plaintiff’s valid and existing business relationships and expectancy  
19 of sales of its products, including the Non-Infringing Shoe Boxes, via Amazon.com  
20 for an improper purpose and by improper means, causing Amazon to remove the

ASINs for the Non-Infringing Shoe Boxes.

2 36. As a direct and proximate result of Defendant's tortious interference,  
3 Plaintiff has suffered damages, including significant losses in sales of the Non-  
4 Infringing Shoe Boxes and other products, resulting in lost revenue and profits  
5 directly attributable to those lost sales.

6 37. Defendant's actions have significantly harmed Plaintiff's business  
7 operations by substantially reducing product rankings on Amazon, which directly  
8 impacts Defendant's product reviews, ratings, and Amazon ranking, which results in  
9 lower product visibility in consumer searches and diminishes market presence.

10        38. The reduced rankings and visibility have caused substantial losses in  
11 sales and profits. Additionally, they have led to increased warehousing and  
12 inventory holding costs due to reduced product turnover.

13 39. These damages extend beyond lost revenue, causing harm to  
14 Plaintiff's goodwill and brand reputation, which are essential for maintaining  
15 competitive standing in the market. The exact amount of these damages will be  
16 proven at trial.

## PRAYER FOR RELIEF

19 WHEREFORE, Plaintiff prays for the following relief:

20 A. Entry of judgment finding Defendant liable for tortious interference

1 with Plaintiff's business relationship;

2 B. Entry of judgment finding Defendant liable for unfair competition  
3 under California Business and Professions Code § 17200, *et seq.*;

4 C. An award of compensatory damages sufficient to make Plaintiff whole  
5 for the harm caused by Defendant's conduct;

6 D. An award of punitive damages in an amount to be determined at trial;

7 E. An award of reasonable attorneys' fees, to the extent authorized by law;

8 F. An award of Plaintiff's costs in this action;

9 G. All such other and further relief as the Court may deem just and proper.

10 **DEMAND FOR JURY TRIAL**

11 Pursuant to Federal Rules of Civil Procedure 38(b), Plaintiff demands a trial  
12 by jury on all claims and issues so triable.

14 DATED: May 10, 2025

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15 By: /s/ Oianwu Yang

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